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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**[PROPOSED] ORDER GRANTING
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF THE JOINT
SUBMISSION IN RESPONSE TO DKT.
191, 191-1 RE: STATUS OF DISCOVERY
DISPUTES**

Referral: Hon. Susan van Keulen, USMJ

[PROPOSED] ORDER

Before the Court is Google's Motion to Seal Joint Submission In Response To Dkt. 191, 191-1 Re: Status of Discovery Disputes ("Motion"). Having considered the Motion, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Document Sought to Be Sealed	Court's Ruling on Motion to Seal	Basis for Sealing Portion of Document
Joint Submission	GRANTED as to redacted portions at pages 7, 8, 11, 12, 24, 31, 59, 60	Narrowly tailored to protect highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details related to cookies, internal identifiers and various data logs maintained by Google, as well as Google's internal communications and practices with regard to Incognito, X-Client-Data Header and their proprietary functions, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.

SO ORDERED.

DATED: _____

HON. SUSAN VAN KEULEN
United States Magistrate Judge